

Date

## ROUTING AND TRANSMITTAL S

12/24

TO: (Name, office symbol, room number, building, Agency/Post)		Initials	Date
1. Bonnie Eleder 5HE -			
2. JCK-12			
3. US EPA RECORDS CENTER REGION 5			
4.  404002			
5.			
Action	File	Note and Return	
Approval	For Clearance	Per Conversation	
As Requested	For Correction	Prepare Reply	
Circulate	For Your Information	See Me	
Comment	Investigate	Signature	
Coordination	Justify		

## REMARKS

Leonard had no new news when  
I spoke with him on Wed.

I called Keith Fry from BASF  
to give him an interim response...  
at our meeting we had promised  
to try to give them some  
feedback by Christmas. Happy  
New Year!

DO NOT use this form as a RECORD of approvals, concurrences, disposals,  
clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)	Room No.—Bldg.
<i>Bob N.</i>	
	Phone No. <i>6-6766</i>

CC: Bess Schenkier  
Bonnie Eleder

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

DATE: Dec. 23, 1987

SUBJECT: Record of Telephone Communication

FROM: Bob Newport

TO: File

SPOKE WITH: Leonard Lipinski, MDNR

PRIMARY  
TOPIC : BASF Site in Riverview, MI

I called Leonard because we had promised BASF we would try to provide some feedback on their proposal (for re-lining the drainage ditch) by Christmas. Leonard confirmed the Superfund offices at MDNR and EPA would be writing a letter back to BASF the first full week in January, and that ~~we~~ would probably not be accepting BASF's proposal. ~~We~~ probably would accept the proposal if the company agreed to install a French Drain under the ditch. However, we don't know if BASF would agree to this. I told Leonard I thought I should call Keith Fry and fill him in on where we stood (since we said we'd try to get back to BASF by this week). Leonard thought that would be a good idea. I said I'd call him back if there were any big breakthroughs.

I spoke with Bess Schenkier later, and she also agreed an interim response to BASF would be a good idea.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

DATE: Dec. 23, 1987

SUBJECT: Record of Telephone Communication

FROM: Bob Newport

TO: File

SPOKE WITH: Keith Fry, BASF

PRIMARY

TOPIC : BASF Site in Riverview, MI

I called Keith to give BASF an interim response on their proposal to re-line the main drainage ditch at the Riverview site. I told him EPA would be writing a letter in early January formally responding to the proposal, and that we were still discussing what the letter would say, but our preliminary conclusion was that the change would not result in a net decrease in pollutant discharges to the River and we could therefore not support it. I said we were trying to think of improvements that could be made in addition to re-lining the ~~the~~ ditch, and specifically mentioned a French Drain. I also emphasized we would like BASF to proceed with the water quality study no matter what. Keith said BASF would think this over, and of course wouldn't provide an official reaction until EPA's letter is received. However, Keith's immediate reaction was that the Decree doesn't require groundwater<sup>pumping and</sup> treatment, and they probably would not voluntarily agree to a French Drain. He also expressed a concern that they

would be pumping a lot of River water (which gets into the site under certain conditions) if they were to install a French Drain. Keith also wasn't sure if BASF would want to proceed with a study on pollutant discharges... he has concerns about what we'll do with the information. I tried to tell him (delicately) we have the authority under Sections 308 and 309 of the CWA to require BASF to do such a study. He agreed, but said the existing Consent Decree (which covers pollution problems at the site) may to some extent affect what we can and cannot do. Keith added the best thing may be to have another meeting a couple of weeks after the official response from EPA is received. In the interim, BASF will consider if there are options besides a French Drain that ~~is~~ would help to reduce pollutant discharges, and think about what they would and would not agree to in terms of site modifications.